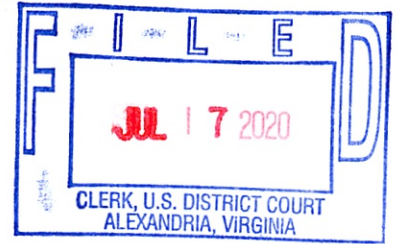


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION



UNITED STATES OF AMERICA,

Plaintiff,

v.

EDWARD SNOWDEN,

Defendant,

and

MACMILLAN PUBLISHING GROUP, LLC
d/b/a HENRY HOLT AND COMPANY,

Relief-Defendant

Case No. 1:19-cv-1197-LO-TCB

MEMORANDUM IN SUPPORT OF RESPONSE IN SUPPORT OF MOTION TO SEAL

Pursuant to Local Civil Rule 5, Non-Party APB respectfully requests that this Court grant Plaintiff's Motion to Seal, which applies to Exhibits 8 and 9 of Plaintiff's Motion to Sanction Edward Snowden for his Refusal to Participate in Civil Discovery. In support of this Motion, Non-Party APB states as follows:

1. In response to a subpoena served by the Federal Programs Branch of the Civil Division of the United States Department of Justice (the "Plaintiff") and subject to a protective order, Non-Party APB produced the spreadsheet attached as Exhibit A to Plaintiff's Memorandum in Support of Plaintiff's Motion to Seal and attached here as Exhibit A (the "Spreadsheet").¹ See *American Program Bureau v. United States*, 1:20-mc-91250 (D. Mass),

¹ Attached hereto is a redacted version of the Spreadsheet. An unredacted version is being filed simultaneously under seal. This document was attached as Exhibit 8 to Plaintiff's Motion for Sanctions.

Dkt. 17 (the “Protective Order”). The Protective Order applies to documents that “reveal proprietary, confidential, and commercially sensitive information, or information likely to cause competitive, business, or commercial injury or disadvantage to APB” and are marked as confidential by APB. *Id.* In accordance with the Protective Order, Plaintiff United States was required file to this confidential document under seal. Plaintiff United States also used the information in Exhibit A to compile a second spreadsheet, attached as Exhibit B to Plaintiff’s Memorandum in Support of Plaintiff’s Motion to Seal and attached here as Exhibit B.² Insofar as Exhibit B contains information derived from the Spreadsheet and considered by Non-Party APB to be confidential information, the Protective Order and this Response in Support of Motion to Seal applies to that information as well.

2. In evaluating a motion to seal, the Court must “(1) provide public notice of the request to seal and allow interested parties a reasonable opportunity to object, (2) consider less drastic alternatives to sealing the documents, and (3) provide specific reasons and factual findings supporting its decision to seal the documents and for rejecting the alternatives.” *Ashcraft v. Conoco, Inc.*, 218 F.3d 288, 302 (4th Cir. 2000).

3. Plaintiff filed a Motion to Seal on the public docket and this Response will be filed in the same manner. This provides the public with ample opportunity to object to the motion.

4. Plaintiff filed redacted versions of Exhibits A and B on the public docket, but because these documents contain primarily confidential and sensitive business information covered by the Protective Order, these versions “gut the documents substantially and render them useless to the public.” *East West LLC v. Rahman*, No. 1:11CV1380 JCC/TCB, 2012 WL

² Attached hereto is a redacted version of Exhibit B. An unredacted version is being filed simultaneously under seal. This document was attached as Exhibit 9 to Plaintiff’s Motion for Sanctions.

3841401, at *3 (E.D. Va. Sept. 4, 2012). As such, there is not a viable alternative to sealing the documents here. *See id.*

5. As indicated by the Protective Order, Exhibits A and B contain confidential and sensitive business information which if disclosed would harm APB's competitive standing. The confidentiality of this information is essential to APB's ability to negotiate and set competitive prices. Although there is a presumption in favor of public access to court documents, there is an exception to this rule when the documents contain "business information that might harm a litigant's competitive standing." *Woven Elecs. Corp. v. Advance Grp., Inc.*, 930 F.2d 913 (4th Cir. 1991). *See also East West LLC v. Rahman*, No. 1:11CV1380 JCC/TCB, 2012 WL 3841401, at *3 (E.D. Va. Sept. 4, 2012) (granting motion to seal expert reports that contain "confidential business information and other trade secret protected information" that "specifically pertain to the parties respective sensitive financial data, including gross profit data, the disclosure of which would be highly likely to cause significant harm to the business competitive position of both parties."); *Intelligent Verification Sys., LLC v. Microsoft Corp.*, No. 2:12-CV-525-AWA-LRL, 2015 WL 13037030, at *1 (E.D. Va. Feb. 6, 2015) (granting motion to seal documents that contain "sensitive business information" finding that "Defendants' competitive positions might be impaired if this information is disclosed to the public at large").

6. Because of the nature of this confidential information, APB cannot provide a specific period of time after which it would be appropriate to unseal this confidential information. As such, APB seeks to have this information sealed permanently.

WHEREFORE, Non-Party APB respectfully requests that the Court grant Plaintiff's Motion to Seal.

Dated: July 17, 2020

Respectfully submitted,

/s/ James E. Tysse

James E. Tysse (VA Bar No. 73490)

Mark J. MacDougall (*pro hac vice forthcoming*)

Abbey E. McNaughton (*pro hac vice
forthcoming*)

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*Attorneys for Non-Party American Program
Bureau*

CERTIFICATE OF SERVICE

I hereby certify that, on this 17th day of June 2020, a true and genuine copy of Non-Party American Program Bureau's Memorandum in Support of Response in Support of Motion to Seal was served on counsel of record for Plaintiff United States of America and Defendant Edward Snowden via electronic mail at the following addresses:

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Counsel for Defendant Edward Snowden

/s/ James E. Tysse

James E. Tysse (VA Bar No. 73490)

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN PROGRAM BUREAU, INC.,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

UNITED STATES OF AMERICA

Plaintiff,

v.

EDWARD SNOWDEN,

Defendant.

Case No. 1:20-mc-91250

This Document Relates To:
Civil Action No. 1:19-cv-01197-LO-TCB
in the United States District Court for the
Eastern District of Virginia

DECLARATION OF ROBERT P. WALKER

I, ROBERT P. WALKER, being over the age of eighteen years and otherwise competent to make this declaration, declare that the following is based on my personal knowledge and is true and correct:

1. I am the President and Chief Executive Officer of American Program Bureau, Inc., a corporation organized under the laws of the Commonwealth of Massachusetts with its principal offices located at One Gateway Center, Suite 751, Newton, MA 02458 ("APB").

2. Attached to this Declaration is a spreadsheet, consisting of three (3) pages under the caption "Edward Snowden Speaking Engagements 2015 – 2020" (the "ES Spreadsheet") that

was prepared by the Vice President and Controller of APB who reports directly to me as President and Chief Executive Officer.

3. In my capacity as Chief Executive Officer of APB, I am responsible for and familiar with the accounting and financial activity of APB and for the books and records maintained by the company in the ordinary course of business.

4. The ES Spreadsheet reflects a total of sixty-seven (67) individual speaking engagements booked by APB directly, or through its affiliate Open Mic Management, for Edward Snowden between September 16, 2015 and May 19, 2020 which constitute all of such engagements booked for Edward Snowden by or through APB (including through Open Mic Management).

5. With respect to each speaking engagement, the ES Spreadsheet provides (a) the date of the engagement, (b) the name of the party responsible for the engagement (the “APB Client”), (c) the amount paid to APB or Open Mic Management pursuant to the contract executed for each engagement, (d) the “speaker honorarium” reflecting the amount payable to Edward Snowden, (e) the commission payable to APB or Open Mic Management and (f) the geographic location of each engagement.

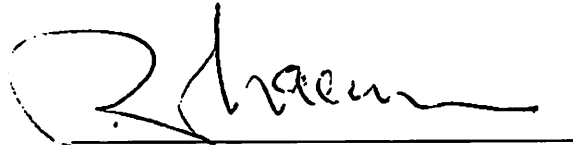
6. Each of the entries on the ES Spreadsheet were made at or near the time of the event or activity reflected therein.

7. The ES Spreadsheet and all entries reflected therein were made by – or from information transmitted by – myself or another employee of APB working under my supervision with personal knowledge of the content thereof and who reported such knowledge in the ordinary course of business.

8. The ES Spreadsheet and all entries reflected therein are of the kind routinely made and kept in the regular course of business by APB.

9. The ES Spreadsheet and all entries reflected therein were in the regular course of business activity by APB.

10. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Robert P. Walker

Dated this 25 day of June, 2020.

EDWARD SNOWDEN SPEAKING ENGAGEMENTS 2015-2020

<u>Event date</u>	<u>Contract</u>	<u>Client</u>	<u>Gross</u>	<u>Speaker honorarium</u>	<u>APB Net</u>	<u>Moderator</u>	<u>Location</u>
09/16/15	64466	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Hong Kong
09/28/15	64655	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Iowa City IA
10/08/15	64631	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Nürnberg
11/03/15	64449	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Sherbrooke QC
11/12/15	65001	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Kingston
12/05/15	64478	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Park City UT
02/16/16	64623	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Boulder CO
02/17/16	64825	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Baltimore MD
03/16/16	65297	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Rust
03/25/16	65527	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Tucson AZ
04/05/16	64556	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Vancouver B.C.
05/12/16	65728	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Zurich
06/01/16	66455	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Berlin
06/28/16	66569	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Roskilde
09/28/16	66088	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Delaware OH
09/29/16	66709	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	TBD
10/05/16	64894	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Washington DC
10/13/16	66134	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Newport Beach CA
10/17/16	65927	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Carefree AZ
10/18/16	64682	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Toronto ON
11/02/16	66510	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Montreal QC
11/15/16	67706	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Oakland CA
11/30/16	67035	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Columbus OH
01/09/17	67713	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Waterloo ON
01/18/17	68051	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Toronto ON
01/19/17	66664	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		San Diego CA
02/01/17	67694	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Pittsburgh PA
02/16/17	68205	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Newport Beach CA
03/16/17	67539	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Middlebury VT
03/21/17	67905	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Hannover
03/22/17	67574	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Stockholm
05/09/17	68831	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Winnipeg
05/15/17	68516	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Washington DC
05/22/17	68466	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Los Angeles CA
05/30/17	68012	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Estoril
08/16/17	69592	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Mexico City

08/22/17	69477	[REDACTED]	[REDACTED]	[REDACTED]	Edmonton	AB
09/09/17	67842	[REDACTED]	[REDACTED]	[REDACTED]	Indianapolis	IN
09/11/17	69286	[REDACTED]	[REDACTED]	[REDACTED]	Philadelphia	PA
09/16/17	68304	[REDACTED]	[REDACTED]	[REDACTED]	St. Louis	MO
10/06/17	67378	[REDACTED]	[REDACTED]	[REDACTED]	Stockholm	
10/24/17	70127	[REDACTED]	[REDACTED]	[REDACTED]	Dublin	
11/08/17	69839	[REDACTED]	[REDACTED]	[REDACTED]	San Francisco	CA
11/13/17	69007	[REDACTED]	[REDACTED]	[REDACTED]	Hamburg	
11/21/17	70290	[REDACTED]	[REDACTED]	[REDACTED]	Istanbul	
01/29/18	70692	[REDACTED]	[REDACTED]	[REDACTED]	New Orleans	LA
03/02/18	70182	[REDACTED]	[REDACTED]	[REDACTED]	Berlin	
03/14/18	68812	[REDACTED]	[REDACTED]	[REDACTED]	Sydney	
03/15/18	71528	[REDACTED]	[REDACTED]	[REDACTED]	Rust	
03/16/18	70331	[REDACTED]	[REDACTED]	[REDACTED]	Rottach-Egern	
03/27/18	70122	[REDACTED]	[REDACTED]	[REDACTED]	Camrose	AB
08/22/18	71660	[REDACTED]	[REDACTED]	[REDACTED]	Sao Paulo	
09/12/18	70797	[REDACTED]	[REDACTED]	[REDACTED]	Chicago	IL
10/24/18	70139	[REDACTED]	[REDACTED]	[REDACTED]	Dublin	
11/06/18	72172	[REDACTED]	[REDACTED]	[REDACTED]	Tel Aviv	
11/08/18	70701	[REDACTED]	[REDACTED]	[REDACTED]	Austin	TX
11/29/18	73019	[REDACTED]	[REDACTED]	[REDACTED]	London	
03/19/19	73047	[REDACTED]	[REDACTED]	[REDACTED]	London	
05/15/19	72973	[REDACTED]	[REDACTED]	[REDACTED]	Las Vegas	NV
06/26/19	74636	[REDACTED]	[REDACTED]	[REDACTED]	San Francisco	CA
08/20/19	74728	[REDACTED]	[REDACTED]	[REDACTED]	Berlin	
09/11/19	73332	[REDACTED]	[REDACTED]	[REDACTED]	Columbus	OH
09/12/19	73425	[REDACTED]	[REDACTED]	[REDACTED]	Columbus	OH
11/29/19	76106	[REDACTED]	[REDACTED]	[REDACTED]	California	
12/02/19	74197	[REDACTED]	[REDACTED]	[REDACTED]	Toronto	ON
01/27/20	76220	[REDACTED]	[REDACTED]	[REDACTED]	Ecublens	
05/19/20	77113	[REDACTED]	[REDACTED]	[REDACTED]	Cologne	

A variance in the amount of \$185,200 exists with respect to the aggregate value of the income reported on the Forms 1099 issued to Mr. Snowden for the relevant reporting periods plus the honoraria for 2020, and the sum of the total reported speaker honoraria. APB cannot locate in its records a Form 1099 issued to Mr. Snowden for 2015. Additionally, an internal APB email attachment indicates that a contribution to the Freedom of the Press Foundation made at the request of Mr. Snowden before November 2017 accounts for \$35,000 of this variance. Together the honoraria reportedly earned in 2015 (\$134,000) and the \$35,000 contribution account for \$169,000 of the variance. The remaining \$16,200 is believed to also have been distributed as one or more charitable contributions at Mr. Snowden's request, although documentation to support that conclusion cannot be located. This spreadsheet was prepared by the Vice President and Controller of American Program Bureau, Inc.

EXHIBIT B

EDWARD SNOWDEN SPEAKING ENGAGEMENTS 2013-2020									
	Event date	Host/ Organization	Speaker honorarium	Location	Format/ Link if applicable	Subject/ Title	APB list	Recording Available	Slide or other Visual Displays
1	03/10/14			Austin, TX	https://www.youtube.com/watch?v=UlhS9aB-qgLU			Y	N
2	3/18/2014				https://www.youtube.com/watch?v=yVwAodrjZMY	APB email re TED talk/ TED Talk with Edward Snowden - Here's How We Take Back the Internet		Y	Y
3	4/8/2014			Europe	https://www.youtube.com/watch?v=3f8Lunf1a2w	PACE Testimony		Y	N
4	6/3/2014					Interview with Ed Snowden and Glenn Greenwald		N	
5	7/19/2014			NYC	https://www.youtube.com/watch?v=0bB7tTknkDw MP4 Video 357	Hope X Discussion with Daniel Ellsberg and Edward Snowden	Y	Y	N
6	10/23/2014				https://www.youtube.com/watch?v=o_Sr96TFQQE	Lawrence Lessig Interviews Edward Snowden		Y	N
7	12/10/2014			France	https://youtu.be/nVRiVihRJuk	Amnesty Int'ernational France		Y	N
8	12/12/2014				https://www.youtube.com/watch?v=ajqaASwbIFE&feature=youtu.be	Edward Snowden The Future of Digital Security		Y	Y
9	2/2/2015			Canada	https://www.youtube.com/watch?v=JXplakujiL8	WAC Forum Discussion		Y	N
10	2/12/2015				https://livestream.com/nytimes/events/3800646/videos/76929642	David Carr Interviews Ed Snowden, Glenn Greenwald, and Laura Poitras		Y	N
11	05/15/19			Las Vegas, NV		30-min speech + 20-min Q&A	Y	N	
12	2/14/2015				https://www.youtube.com/watch?v=yS53oQyYsQQ	Edward Snowden and Ben Wizner at ACLU Forum		Y	Y
13	2/19/2015				https://www.youtube.com/watch?v=-spaAf18-l			Y	Y
14	03/19/19			London		speech	Y	N	
15	3/18/2015			Germany (Deutsche Wells/CeBit)	https://www.youtube.com/watch?v=C3JVWVg1gLC MP4 Video 352	Edward Snowden and Glenn Greenwald CeBit Conference 2015	Y	Y	N
16	4/20/2015			UK	https://vimeo.com/122731239	Future Fest 2015 Interview		Y	N
17	5/1/2015			Princeton, NJ	https://www.youtube.com/watch?v=ZyztH-1oyFN0	Bart Gellman Interviews Ed Snowden		Y	N
18	5/8/2015			Norway	https://youtu.be/QnnrosfSpPg	Runa Sandvik Interviews Edward Snowden		Y	Y
19	03/16/18			Rottach-Egern			Y	N	
20	5/15/2015					Whistleblowing and Government Surveillance		N	
21	09/05/15			Norway	https://www.youtube.com/watch?v=q0Ql0t4YBxY	Award Presentation to Snowden		Y	N
22	09/16/15			Hong Kong			Y	N	
23	09/28/15			Iowa City, IA		University of Iowa Lecture Committee/Veterans for Peace/contract	Y	N	
24	10/08/15			Nürnberg	MP4 Video 358		Y	Y	Y
25	11/03/15			Sherbrooke, QC	https://montrealgazette.com/news/edward-snowden-speaks-about-surveillance-and-cybersecurity-at-bishops-university	The Donald Lecture Series	Y	Y	N

26	11/10/15		U.S.	https://www.youtube.com/watch?v=GvcND_koF5g	Whistleblowers sponsored by PEN		Y	N
27	11/12/15		Kingston			Y	N	
28	12/05/15		Park City, UT	https://www.youtube.com/watch?v=SVkMIDwXihU	Technology and Freedom	Y	Y	N
29	02/16/16		Boulder, CO	& MP4 Video 349	Distinguished Speaker series	Y	N	
30	02/17/16		Baltimore, MD		45-min moderated convo + 45-min moderated Q&A	Y	N	
31	02/18/16				Distinguished Speaker series		N	
32	03/16/16		Rust			Y	N	
33	03/25/16		Tucson, AZ	https://vimeo.com/160952562	Panel Discussion on Privacy and Technology	Y	Y	Y
34	11/29/19		California			Y	N	
35	04/05/16		Vancouver, B.C.	https://www.youtube.com/watch?v=RLbDKf_6oOQ&list=PLAE6095A3228AAE9E&index=5&t=0s&app=desktop		Y	Y	Y
36	04/05/16		Canada	https://www.youtube.com/watch?v=RLbDKf_6oOQ	Ed Snowden: Big Data, Security, and Human Rights		Y	N
37	05/12/16		Zurich	https://www.youtube.com/watch?v=dnZ58OIPVQU	Encryption Works; Encryption and other effective measures to protect enterprise	Y	Y	N
38	06/01/16		Berlin		Empowering Founders to Build a Web that is Decentralized, Safe, Immutable and Permanent	Y	N	
39	06/28/16		Roskilde		Surveillance	Y	N	
40	03/14/18		Sydney		1-hour keynote presentation + 1-hour Q&A	Y	N	
41	03/15/18		Rust		45-min moderated convo	Y	N	
42	3/16/2018				30-min moderated convo		N	
43	08/27/16		Foreign	https://www.youtube.com/watch?v=VCRQH47zU	Snowden Speaks on Hillary Clinton, Emails, Trump, and Freedom	Y	Y	N
44	09/28/16		Delaware, OH	https://www.owu.edu/about/follow-owu/stream-owu/academics/september-28-2016-sagan-national-colloquium-edward-snowden/	Topic: Data in Our Lives	Y	N	
45	09/29/16					Y	N	
46	10/05/16		Washington, D.C.			Y	N	
47	10/13/2016		Newport Beach, CA			Y	N	
48	03/27/18		Camrose, AB		An Evening with Edward Snowden on Security, Public Life, and research	Y	N	
49	8/22/2018				45-60-min speech + 15-min Q&A		N	
50	10/24/18		Dublin		20-minute moderated convo	Y	N	
51	10/30/2018				45-min keynote + 15-min Q&A		N	
52	11/06/18		Tel Aviv			Y	N	
53	11/08/18		Austin, TX		1-hour moderated interview	Y	N	
54	11/29/18		London		speech	Y	N	
55	10/17/16		Carefree, AZ			Y	N	
56	10/18/16		Toronto, ON			Y	N	
57	11/02/16		Montreal, QC	https://www.youtube.com/watch?v=NM_aSfnt3po	Privacy and Surveillance	Y	Y	N
58	11/10/16			https://www.youtube.com/watch?v=umnA_JTw9p0	Snowden Live		Y	Y

59	11/15/16		Oakland, CA	https://www.youtube.com/watch?v=BUCCEKrU8o	Edward Snowden LIVE: Facebook's Role in The Election, The Future of The Surveillance State	Y	Y	N
60	11/30/16		Columbus, OH			Y	N	
61	01/09/17		Waterloo, ON		60 Years of Innovation	Y	N	
62	01/17/17		Canada	Transcript at https://www.equities.com/nsa-whistleblower-edward-snowden-speaks-at-cantech-investment-conference-2017	Cantech Investment Conference		Y	
63	08/22/18		Sao Paulo			Y	N	
64	09/12/18		Chicago, IL			Y	N	
65	01/18/17		Toronto, ON			Y	N	
66	01/19/17		San Diego, CA			Y	N	
67	02/01/17		Pittsburgh, PA		A Live Video Conversation with Edward Snowden	Y	N	
68	02/16/17		Newport Beach, CA		an evening with ES; moderated Q&A	Y	N	
69	03/16/17		Middlebury, VT		opening remarks; moderated discussion; Q&A	Y	N	
70	03/21/17		Hannover		opening remarks; moderated discussion	Y	N	
71	03/22/17		Stockholm		speech	Y	N	
72	04/18/17		Williamsburg, VA	https://www.youtube.com/watch?v=CFIVcmvHaKI	Snowden: Democracy Under Surveillance		Y	Y
73	05/09/17		Winnipeg	https://www.youtube.com/watch?v=D-GfYS3O5h4	Axworthy Distinguished Lecture	Y	Y	N
74	05/15/17		Washington, D.C.	https://oneworldidentity.com/transcript-edward-snowden-speaks-first-annual-know-identity-conference/	45-minute interview, with Qs provided in advance	Y	Y	N
75	05/22/17		Los Angeles, CA		30-minute keynote speech	Y	N	
76	7/13/2017		Estroril, Portugal	https://www.youtube.com/watch?v=VbaEBNLFGpM	Global Migration-The Great Challenge of the Century		Y	N
77	08/16/17		Mexico City		60-min moderated discussion; 15-min Q&A	Y	N	
78	08/22/17		Edmonton, AB		25-min speech + VIP reception w/ 30-min Q&A	Y	N	
79	09/09/17		Indianapolis, IN		45-min moderated convo + 15-min Q&A	Y	N	
80	09/11/17		Philadelphia, PA	https://www.youtube.com/watch?v=dxdH8WvFXwA	Conversation with Edward Snowden / 45-min moderated convo + 15-min Q&A	Y	Y	N
81	09/16/17		St. Louis, MO		1-hour "cocktail hour" + 1-hr keynote presentation	Y	N	
82	10/06/17		Stockholm		1-hour keynote	Y	N	
83	10/24/17		Dublin		20-minute moderated convo	Y	N	
84	05/30/17		Estoril	Video 1 : https://www.youtube.com/watch?v=ftB1T2GQm1k Video 2: https://www.youtube.com/watch?v=IU1Se6xe8CU	45-minute speech, then 45-minute moderated conversation	Y	Y	N
85	11/08/17		San Francisco, CA		1-hour keynote + 30-min Q&A; VIP meet & greet	Y	N	
86	11/13/17		Hamburg		30-min interview	Y	N	

